

REMARKS

In response to the Office Action dated August 9, 2005, claims 1, 10, 14, and 19 have been amended. Claims 1-20 are in the case. Reexamination and reconsideration of the application, as amended, are requested.

Claims 19-20 were rejected under 35 U.S.C. § 101 as being not directed to non-statutory subject matter.

The Applicant respectfully traverses this rejection. However, in an effort to expedite the prosecution of this case, the Applicant has amended claims 19-20 as suggested by the Examiner to overcome this rejection.

The Office Action rejected claims 1-3 under 35 U.S.C. 102(e) as allegedly being anticipated by Smith et al. (U.S. Patent No. 6,601,159).

The Applicants respectfully traverse this rejection in light of the amendments to the claims and submit that the Smith et al. reference does not disclose all of the claimed features. Namely, Smith et al. merely discloses an "...integrated information support system..." for a copy machine that give users "...access to vast quantities of graphical, textual, video and audio information..." using a "...large capacity memory device, such as a CD ROM..." (see Abstract of Smith et al.).

However, Smith et al. does **not** disclose the Applicant's claimed response module configured to automatically receive up-to-date audio/video printer information to the display in direct proximity with the printer via a network connected to the supplemental audio/video control device in response to a user initiated query regarding printer troubleshooting problems. (see for example, at least paragraphs [0019] and [0024] of the Applicant's U.S. Publication No. 2003/0086109). Therefore, since Smith et al. does not disclose all of the elements of the Applicant's claimed invention, Smith et al. cannot anticipate the claims, and hence, the Applicant submits that the rejection 35 U.S.C. 102(e) under should be withdrawn.

The Office Action rejected claims 10-12, 14-17, and 19 under 35 U.S.C. 103(a) as allegedly being unpatentable over Smith et al. in view of Takemoto et al. (U.S. Patent No. 6,718,490). The Office Action rejected claims 6-9 under 35 U.S.C. 103(a) as allegedly being unpatentable over Smith et al. as applied to claim 1 and further in view of Takemoto et al. The Office Action rejected claims 4, 5, 13, 18, and 20 under 35 U.S.C. 103(a) as

allegedly being unpatentable over Smith et al. and Takemoto et al. as applied to claims 1, 10, 14, and 19, and further in view of Bruno et al. (U.S. Patent No. 5,784,561).

The Applicant respectfully traverses these rejections based on the amendments to the claims and the arguments below.

The Applicant submits that the combination of Smith et al., Takemoto et al., and Bruno et al. do not disclose, teach, or suggest the Applicant's claimed response module configured to automatically receive up-to-date audio/video printer information to the display in direct proximity with the printer via a network connected to the supplemental audio/video control device in response to a user initiated query regarding printer troubleshooting problems.

Specifically, with regard to claims 1-18, Takemoto et al. simply disclose a printer that can be connected to a network while Smith et al. merely disclose a multimedia help system for a copy machine. Although Smith et al. disclose giving users access to vast quantities of graphical, textual, video and audio information, for the copy machine, the audio/video information in Smith et al. is from a "...large capacity memory device, such as a CD ROM...", and could be out-dated (see Abstract of Smith et al.). In contrast, the Applicant's claimed invention provides up-to-date audio/video printer information via a network in response to a user initiated queries. Clearly, the combined references are missing the Applicant's capability of providing real-time up-to-date audio/video printer information during current troubleshooting of the printer by the user.

In addition, with regard to claim 19, although Bruno et al. disclose an on-demand real-time video conferencing system (see Abstract of Bruno et al.), unquestionably, the combined references do not disclose, teach, or suggest the Applicant's allowing a user to automatically initiate a video conference with a **troubleshooting technical support center** for the printer if a predetermined error condition occurs with the printer. Support for this elements can be found at least at paragraph [0025] of the Applicant's U.S. Publication No. 2003/0086109. This **failure** of the cited references, in combination or alone, to disclose, suggest or provide motivation for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness (*MPEP* 2143).


With regard to the rejection of the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that

are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicants kindly request the Examiner to telephone the Applicants' attorney at **(818) 885-1575** if the Examiner has any questions or concerns. Please note that all correspondence should continue to be directed to:

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Respectfully submitted,
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